

September 24, 2003

Sent via e-mail, hand delivery and FAX (617) 345-9103

Mary L. Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: UNE Triennial Review Regarding Switching for Large Business Customers  
D.T.E. 03-59

Dear Secretary Cottrell:

Enclosed for filing please find a Motion on behalf of the Communications Workers of America to Intervene and Participate and a Certificate of Service in the above entitled matter.

Thank you for your attention to this request.

Sincerely,

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James F. Norton  
Paven & Norton  
15 Foster Street  
Quincy, MA 02169-5307  
(617) 847-1719

cc: Attached service list (w/enc.)  
Dr. Kenneth Peres  
Jesse Keyes, Hearing Officer

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Proceeding by the Department of Telecommunications and Energy on its )  
own Motion to Implement the Requirements of the Federal )  
Communications Commission's Triennial Review Order Regarding ) D.T.E. 03-59  
Switching for Large Business Customers Served by High-Capacity Loops. )  
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**MOTION OF THE  
COMMUNICATIONS WORKERS OF AMERICA  
TO INTERVENE AND PARTICIPATE**

The Communications Workers of America (CWA) respectfully moves to intervene and to participate in the above entitled matter and states as its reasons therefor, that the CWA is a labor organization that represents employees at Verizon and AT&T in the Commonwealth of Massachusetts. CWA members have an interest in this proceeding that will impact the financial and operational ability of their employers Verizon and AT&T to maintain appropriate staffing levels in order to operate, maintain, sell, service, and invest in network facilities and quality customer service.

The CWA also requests that Dr. Kenneth Peres, CWA representative be added to the service list:

Dr. Kenneth Peres  
Research Economist  
Communications Workers of America, District One  
80 Pine Street, 37<sup>th</sup> Floor  
New York, NY 10005  
Phone: (212) 344-2515  
Fax: (212) 425-2947  
Email: [kperes@cwa-union.org](mailto:kperes@cwa-union.org)

Wherefor, the Communications Workers of America respectfully requests that it be permitted to intervene and to participate in this matter to the extent appropriate and permitted by the Department.

Respectfully submitted,  
Communications Workers of America  
By its counsel,

James F. Norton  
Paven & Norton  
15 Foster Street  
Quincy, MA 02169-5307  
(617) 847-1719  
Email: jfnlaw@aol.com

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this 24<sup>th</sup> day of September, 2003, served the foregoing document upon each person designated in the service list by either hand delivery, mail, and/or e-mail.

James F. Norton  
Paven & Norton  
15 Foster Street  
Quincy, MA 02169-5307  
(617) 847-1719  
Email: jfnlaw@aol.com

September 24, 2003

Sent via e-mail, hand delivery and/or U.S. Mail

Mary L. Cottrell, Secretary  
Massachusetts Department of Telecommunications and Energy  
One South Station, 2nd Floor  
Boston, MA 02110

Re: UNE Triennial Review Regarding Switching for Mass Market Customers  
D.T.E. 03-60

Dear Secretary Cottrell:

Enclosed for filing please find a Motion on behalf of the Communications Workers of America to Intervene and Participate in the above entitled matter. A certificate of service will follow when I have obtained a service list.

Thank you for your attention to this request.

Sincerely,

---

James F. Norton  
Paven & Norton  
15 Foster Street

Quincy, MA 02169-5307  
(617) 847-1719

cc: Dr. Kenneth Peres

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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Proceeding by the Department of Telecommunications and Energy on its )  
own Motion to Implement the Requirements of the Federal )  
Communications Commission's Triennial Review Order Regarding ) D.T.E. 03-60  
Switching for Mass Market Customers )  
\_\_\_\_\_ )

**MOTION OF THE  
COMMUNICATIONS WORKERS OF AMERICA  
TO INTERVENE AND PARTICIPATE**

The Communications Workers of America (CWA) respectfully moves to intervene and to participate in the above entitled matter and states as its reasons therefor, that the CWA is a labor organization that represents employees at Verizon and AT&T in the Commonwealth of Massachusetts. CWA members have an interest in this proceeding that will impact the financial and operational ability of their employers Verizon and AT&T to maintain appropriate staffing levels in order to operate, maintain, sell, service, and invest in network facilities and quality customer service.

The CWA also requests that Dr. Kenneth Peres, CWA representative be added to the service list:

Dr. Kenneth Peres  
Research Economist

Communications Workers of America, District One  
80 Pine Street, 37<sup>th</sup> Floor  
New York, NY 10005  
Phone: (212) 344-2515  
Fax: (212) 425-2947  
Email: [kperes@cwa-union.org](mailto:kperes@cwa-union.org)

Wherefor, the Communications Workers of America respectfully requests that it be permitted to intervene and to participate in this matter to the extent appropriate and permitted by the Department.

Respectfully submitted,  
Communications Workers of America  
By its counsel,

James F. Norton  
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